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**Subject:** EPA Requests - Coordination on Review / input into draft renewable biomass section of RFS2 and data identification / access and baseline(s) determination  
**Date:** 10/02/2009 12:34 PM  
**Importance:** High  
**Attachments:** [Renewable Biomass Implementation Approaches Preamble 10-2-09 pa.doc](#)

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Hi Harry,

As noted in our previous communications, we are moving quickly to our next steps in coordinating with you and your team with regard to revising our RFS2 package to account for applying modified provisions for the renewable biomass compliance program.

First, I have attached our draft preamble language which is our first step in developing language to frame and support the concept of the aggregate compliance approach. Please review /distribute to your team for a prompt review and provide us with your comments ASAP (by Wednesday noon latest). Meg has included some call out balloons in certain areas where we are requesting specific input from your team, including descriptions of the data, how the data can / will be used etc. in defending this approach. These are critical areas. We are of course seeking input on the full draft as well. Meg McCarthy is lead on this section with support from a number of us.

We are also getting ready to initiate direct engagement on the data sets which we are looking to use to support building our case / defense for the aggregate approach and specifically the number / numbers. Our intention is come up with a number and potentially application of a defensible formula - or a set of regional numbers which will act as the crop land threshold(s). We have three options / approaches generally noted in the draft attachment that we'll need to discuss. We'll of course need prompt support on this as well because these number will then need to go into the language and be bound by appropriate descriptors. Karen Laughlin is leading our coordination on these discussions with support from the rest of us.

The lions share of all this work needs to be done over the course of the next 2 weeks -- so we appreciate your teams time and attention to all this.

Please let me know if you have any questions. We'll likely need a quick committee check-in call in the very near future to handle some of this in real time. I'll look to see where things are by mid-week and then look to schedule something after gauging our progress.

Thanks, Paul



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Best, Paul

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